CD7 #

FAQ Benzene Handbook Documents BB FF

40 Is the benzene in the condensate from coke oven gas lines counted in the determination of TAB?

Benzene in any aqueous waste that is generated within the facility boundary of a coke byproduct recovery plant is counted. However, condensate generated outside the byproduct recovery plant, such as in the steelmaking complex, is not counted in the TAB determination. [Citations: 40 CFR §61.300(a) and 40 CFR §61.340(a)]

46 What is the point of generation for wastes at coke byproduct plants that are processed in sources that are already controlled by the benzene NESHAP for coke byproduct recovery plants? For example, are TAB and benzene concentration determinations made before or after the ammonia stripper?

For these sources, the point of generation is defined as the location where the waste exits a unit that is controlled by the byproduct plant NESHAP (40 CFR§61 Subpart L) and before it is exposed to the atmosphere. If the units up to the ammonia stripper are controlled (as required for metallurgical coke plants), and the ammonia stripper is a closed system (vented back to the coke oven gas), the point of generation is the wastewater leaving the ammonia stripper. [Citation: 40 CFR §61 Subpart L]

Current rule

61.355(b)(2)

(b) For purposes of the calculation required by paragraph (a) of this section, an owner or operator shall determine the annual waste quantity at the point of waste generation, unless otherwise provided in paragraphs (b) (1), (2), (3), and (4) of this section, by one of the methods given in paragraphs (b) (5) through (7) of this section.

(1) The determination of annual waste quantity for sour water streams that are processed in sour water strippers shall be made at the point that the water exits the sour water stripper.

(2) The determination of annual waste quantity for wastes at coke by-product plants subject to and complying with the control requirements of §61.132, 61.133, 61.134, or 61.139 of subpart L of this part shall be made at the location that the waste stream exits the process unit component or waste management unit controlled by that subpart or at the exit of the ammonia still, provided that the following conditions are met:

(i) The transfer of wastes between units complying with the control requirements of subpart L of this part, process units, and the ammonia still is made through hard piping or other enclosed system.

(ii) The ammonia still meets the definition of a sour water stripper in §61.341.

Definitions

Waste stream means the waste generated by a particular process unit, product tank, or waste management unit. The characteristics of the waste stream (e.g., flow rate, benzene concentration, water content) are determined at the point of waste generation. Examples of a waste stream include process wastewater, product tank drawdown, sludge and slop oil removed from waste management units, and landfill leachate.

Waste means any material resulting from industrial, commercial, mining or agricultural operations, or from community activities that is discarded or is being accumulated, stored, or physically, chemically, thermally, or biologically treated prior to being discarded, recycled, or discharged.

Waste management unit means a piece of equipment, structure, or transport mechanism used in handling, storage, treatment, or disposal of waste. Examples of a waste management unit include a tank, surface impoundment, container, oil-water separator, individual drain system, steam stripping unit, thin-film evaporation unit, waste incinerator, and landfill

Coke By-Products NESHAP Background document

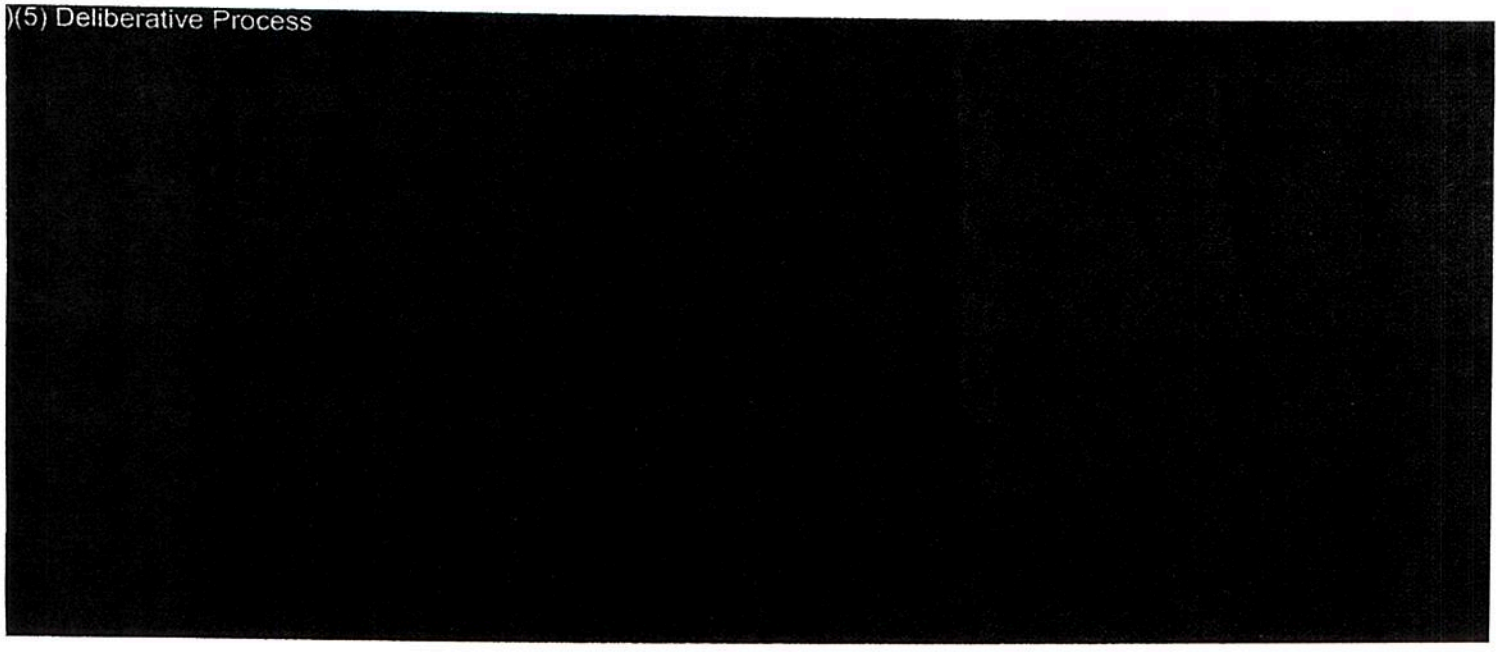
Waste per Subpart L

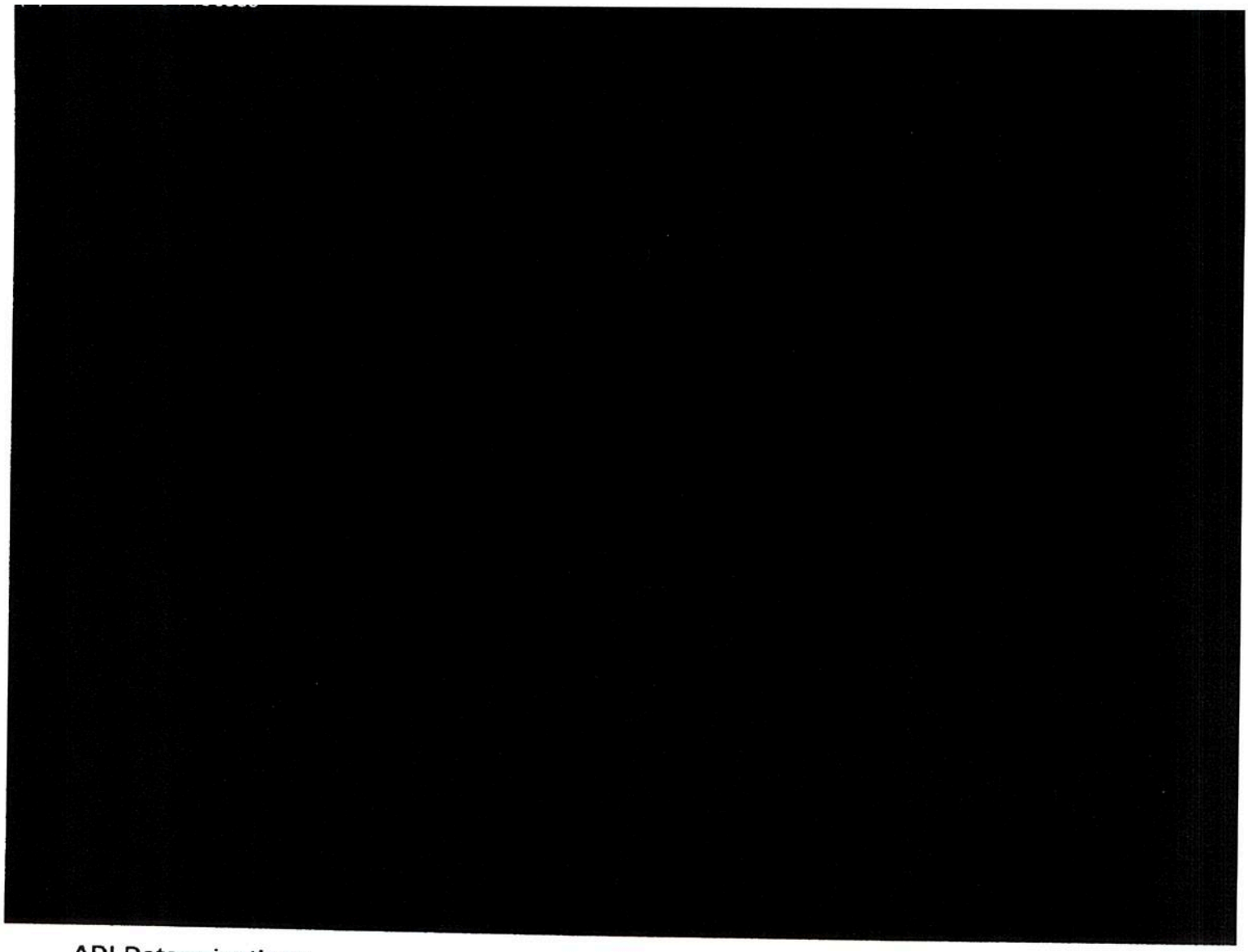
Page 59 of 466, see figure 3-9, streams leaving wash oil still, light oil separator, light oil rectifieder, separators etc, all identified as wastewater to intercepting sump.

Corresponds with streams in NEIC process diagrams, appendix A (for us the intercepting sump is the naphthalene sump)

Also see section 3.2.7 (starts on pg 62) discussion on wastewater processing, and discussions of sumps.

)(5) Deliberative Process





ADI Determinations

Attached are two determinations that clarify that the tar decanter must be sealed, and everything going to the ammonia still must also be sealed.